

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN REINSURANCE COMPANY, et al.,

Plaintiffs,

v.

AMERICAN INTERNATIONAL GROUP AND
TRENWICK AMERICA REINSURANCE
CORPORATION,

Defendants.

Civil Action No. 05-11840-MLW

STIPULATION TO ENLARGE TIME

Pursuant to Fed.R.Civ.P. 6(b), plaintiffs American Reinsurance Company, et al., and defendants hereby stipulate to enlarge until October 14, 2005 the time in which it has to respond to the each of the defendants' motions to stay. The parties have further agreed to discuss plaintiffs' request for additional time beyond October 14. As grounds for this request for an extension, plaintiffs state that they need additional time to explore the novel factual and legal issues involved in seeking to remand this case to state court. Plaintiffs believe the grounds for remand would raise similar and related issues to an opposition to the motions to stay and therefore the oppositions to the motions to stay and any motion to remand should be briefed and argued simultaneously.

By their attorney,

/s/ Steven L. Schreckinger
Steven L. Schreckinger (BBO #447100)
PALMER & DODGE LLP
111 Huntington Avenue at Prudential
Center
Boston, MA 02199-7613
617.239.0100

OF COUNSEL:

Joseph T. McCullough IV
Robin C. Dusek
Lovells
One IBM Plaza
Suite 1900
Chicago, IL 60611
(312) 832-4400

Kathy L. McFarland
Lovells
900 Third Avenue
New York, NY 10022
(312) 832-4400
AGREED TO:

John T. Harding
Morrison Mahoney LLP
250 Summer Street
Boston, MA 02210
(617) 439-7558

Margaret A. Dale
Proskauer Rose LLP
1585 Broadway
New York, NY 10036
(212) 969-3000

Dated: October 7, 2005

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon the attorney of record for each other party by mail on October 7, 2005.
